

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2020-247-A

In the Matter Of)	
)	
Public Service Commission Review of)	NOTICE OF
South Carolina Code of Regulations Chapter)	PARTICIPATION AND
103 Pursuant to S.C. Code Ann.)	COMMENTS OF PIEDMONT
Section 1-23-120(J))	NATURAL GAS
)	COMPANY, INC.
)	

Pursuant to the Public Service Commission of South Carolina's ("Commission") March 30, 2021 4th Amended Notice of Workshops ("Notice"), Piedmont Natural Gas Company, Inc. ("Piedmont" or the "Company") hereby provides notice that it intends to participate in the April 16, 2021 Workshop on S.C. Code Ann. Reg. 103-400 *et seq.* ("SC Gas Regulations") and submits the following comments on the SC Gas Regulations.

COMMENTS

S.C. Code Ann. Reg. 103-421: This regulation requires gas utilities to read meters and render bills on a monthly basis of not less than twenty-eight nor more than thirty-four days. Piedmont recommends that the Commission strike the reference to "of not less than twenty-eight days nor more than thirty-four days" as it is superfluous given the reference to monthly billing, and overly prescriptive.

S.C. Code Ann. Reg. 103-430(c): This regulation requires gas utilities to "post a notice in a conspicuous place in each office of the gas utility where applications for service are received, informing the public that copies of the rate schedules and rules relating to the service of the gas utility, as approved by the Commission, are available

for inspection at the gas utility.” Due to changes in how Piedmont operates its business, Piedmont no longer has offices accessible to existing or prospective customers, nor to the general public. As such, this regulation no longer has applicability to Piedmont’s operations. Notwithstanding this fact, Piedmont does make its current Commission-approved rate schedules and service regulations available on its public website at all times. Piedmont respectfully suggests that the Commission consider changing the existing posting regulation to require website availability of its tariffs and rates.

S.C. Code Ann. Reg. 103-440(6): This regulation requires gas utilities, in situations where the customer has been undercharged due to human or machine error, to back bill the customer for the deficiency. Specifically, this regulation states “[i]f the gas utility has undercharged any customer as a result of misapplied schedule, an error in reading the meter, a skipped meter reading, or any human or machine error, except as provided in 1 and 2 of this rule above, then the gas utility *shall* recover the deficient amount as provided as follows:” [emphasis added]. Piedmont recommends that the word “shall” be replaced with the word “may.” Piedmont seeks this change in order to have some reasonable discretion to forgo back billing the customer as may be warranted by circumstances.

S.C. Code Ann. Reg. 103-471(c): This regulation requires gas utilities to test turbine meters every six months. Piedmont recommends that the frequency of periodic testing for turbine meters be modified to 24 months. The opinion of Piedmont’s engineers, based on their experience and information available to them, is

that a 24-month turbine meter testing regimen is adequate to ensure accurate measurements through these meters.

CONCLUSION

Based upon the foregoing, Piedmont respectfully requests that the Commission accept its Comments in this proceeding as set forth above and looks forward to continued participation in this proceeding.

Respectfully submitted, this the 6th day of April, 2021.

Piedmont Natural Gas Company, Inc.

/s/ T. Richmond McPherson

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the attached is being served this date upon all of the parties to this docket electronically or by depositing a copy of the same in the United States Mail, First Class Postage Prepaid, at the addresses contained in the official service list in this proceeding.

This the 6th day of April, 2021.

/s/ Richard K. Goley
Richard K. Goley